

## REMARKS

Claims 35-55 were previously pending in this patent application. Claims 27-34 were withdrawn from further consideration pursuant to 35 U.S.C. Section 121. Claims 35-55 stand rejected. Herein, Claims 35, 36, 44, and 52 have been amended. Accordingly, after this Amendment and Response, Claims 35-55 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

### 35 U.S.C. Section 103(a) Rejections

Claims 35, 38, 44, 50, and 52-55 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Mui et al., U.S. Patent No. 6,037,265 (hereafter Mui) in view of Applicant's Admitted Prior Art (AAPA). Claims 36, 37, 39-43, 45-49, and 51 are rejected Mui et al., U.S. Patent No. 6,037,265 (hereafter Mui) in view of Applicant's Admitted Prior Art (AAPA), and further view of additional Examiner comments. These rejections are respectfully traversed. These rejections are respectfully traversed.

Independent Claim 35 recites:

A process for making a semiconductor structure comprising:  
depositing a conductive layer upon a substrate comprising a silicon oxide-silicon nitride-silicon oxide (ONO) layer;  
depositing a conductive adhesive layer between said substrate and said conductive layer, wherein said conductive adhesive layer has a minimum thickness required to provide adhesion between said substrate and said conductive layer for a robust structure that can

withstand subsequent processing, ***wherein said conductive adhesive layer has a thickness that is less than 300 angstroms;*** and

etching a portion of said conductive layer and a portion of said conductive adhesive layer utilizing a plasma, wherein said plasma comprises an etchant, wherein said etchant comprises one or more of the group consisting of chlorine and oxygen, wherein said plasma is ionized and sustained by a first RF source, and wherein said plasma is accelerated by a second RF source. (emphasis added)

It is respectfully asserted that the combination of Mui and AAPA does not disclose the present invention as recited in Independent Claim 35. In particular, Independent Claim 35 recites the limitation "***wherein said conductive adhesive layer has a thickness that is less than 300 angstroms***" (emphasis added). The Examiner comments (at page 7) argue that Mui discloses a conductive adhesive layer (16) that has a thickness typically from 300 angstroms to about 8000 angstroms. Further, Mui describes that the thickness is more preferably from about 500 angstroms to 6000 angstroms, more preferably from about 1000 angstroms to about 3000 angstroms. [Mui, Col. 6, lines 9-14]. That is, Mui teaches away from a conductive adhesive layer that has a thickness that is less than 300 angstroms. The AAPA does not teach, suggest, or motivate a conductive adhesive layer that has a thickness that is less than 300 angstroms. Therefore, it is respectfully submitted that Independent Claim 35 is patentable over the combination of Mui, AAPA, and Examiner comments and is in condition for allowance.

Dependent Claims 36-43 are dependent on allowable Independent Claim 35, which is allowable over the combination of Mui, AAPA, and Examiner comments. Hence, it is respectfully submitted that Dependent Claims 36-43 are patentable over the combination of Mui, AAPA, and Examiner comments for the reasons discussed above.

It is respectfully asserted that Mui does not disclose the present invention as recited in Independent Claim 44. In particular, Independent Claim 44 recites the limitation "wherein said conductive adhesive layer has ***a thickness that is less than 300 angstroms***" (emphasis added). The Examiner comments (at page 7) argue that Mui discloses a conductive adhesive layer (16) that has a thickness typically from 300 angstroms to about 8000 angstroms. Further, Mui describes that the thickness is more preferably from about 500 angstroms to 6000 angstroms, more preferably from about 1000 angstroms to about 3000 angstroms. [Mui, Col. 6, lines 9-14]. That is, Mui teaches away from a conductive adhesive layer that has a thickness that is less than 300 angstroms. The AAPA does not teach, suggest, or motivate a conductive adhesive layer that has a thickness that is less than 300 angstroms. Therefore, it is respectfully submitted that Independent Claim 44 is patentable over the combination of Mui, AAPA, and Examiner comments and is in condition for allowance.

Dependent Claims 45-51 are dependent on allowable Independent Claim 44, which is allowable over the combination of Mui, AAPA, and Examiner comments. Hence, it is respectfully submitted that Dependent Claims 45-51 are patentable over the combination of Mui, AAPA, and Examiner comments for the reasons discussed above.

It is respectfully asserted that Mui does not disclose the present invention as recited in Independent Claim 52. In particular, Independent Claim 52 recites the limitation "***polysilicon layer has a thickness that is less than 300 angstroms to provide adhesion*** between said silicon oxide-silicon nitride-silicon oxide (ONO) layer and said conductive layer" (emphasis added). The Examiner comments (at page 7) argue that Mui discloses a conductive adhesive layer (16) that has a thickness typically from 300 angstroms to about 8000 angstroms. Further, Mui describes that the thickness is more preferably from about 500 angstroms to 6000 angstroms, more preferably from about 1000 angstroms to about 3000 angstroms. [Mui, Col. 6, lines 9-14]. That is, Mui teaches away from a conductive adhesive layer that has a thickness that is less than 300 angstroms. The AAPA does not teach, suggest, or motivate a conductive adhesive layer that has a thickness that is less than 300 angstroms. Therefore, it is respectfully submitted that Independent Claim 52 is patentable over the combination of Mui, AAPA, and Examiner comments and is in condition for allowance.

Dependent Claims 53-55 are dependent on allowable Independent Claim 52, which is allowable over the combination of Mui, AAPA, and Examiner comments. Hence, it is respectfully submitted that Dependent Claims 53-55 are patentable over the combination of Mui, AAPA, and Examiner comments for the reasons discussed above.

### CONCLUSION

It is respectfully submitted that the above claims, arguments and remarks overcome all rejections and objections. All remaining claims (Claims 35-55) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 35-55) are in condition for allowance.

The Examiner is urged to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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